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Gamurs, Inc., Andrew Eisbrouch, Dan Van Winkle  
and Kaila Hale-Stern

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

*Southern District  
of New York*

JESSICA MASON,

Plaintiff,

vs.

THEMARYSUE, LLC, a Delaware limited  
liability corporation, GAMURS, INC., a  
Delaware business corporation, TRINET HR  
III, INC., a California business corporation,  
ANDREW EISBROUCH, individually, DAN  
VAN WINKLE, individually, and KAILA  
HALE-STERN, individually,

Defendants.

Case No.: 3:22-cv-00766-YY →

*22 cv 7341 (JGK)*

**JOINT STATUS REPORT**

Plaintiff Jessica Mason (“Plaintiff”) and Defendants TheMarySue, LLC (“TMS”) Gamurs, Inc. (“Gamurs”), Andrew Eisbrouch, Dan Van Winkle, and Kaila Hale-Stern (“TMS Defendants”), by and through their undersigned counsel, respectfully submit the following Rule 26(f) Report and Joint Proposed Case Schedule.

**1. Proposed Case Schedule and Deadlines:**

The Parties jointly propose the following case schedule and deadlines:

Event	Current	Proposed Date
Fact discovery to be completed	9/23/2022	10/31/2022
File all pleadings pursuant to Fed. R. Civ. P. 7(a) and 15	9/23/2022	10/31/2022
Join all claims, remedies, and parties pursuant to Fed. R. Civ. P. 18 and 19	9/23/2022	10/31/2022
Pretrial and discovery motions due	9/23/2022	10/31/2022
Dispositive motions due	9/23/2022	12/01/2022
Joint ADR report due	10/23/2022	10/23/2022
Expert Discovery	9/23/2022	10/31/2022
Pretrial Order due	N/A	N/A

**2. Other Items:**

- a. Alternative Dispute Resolution: The parties have not held settlement discussions, but discussed participating in alternative dispute resolution. Plaintiff believes ADR will assist in the resolution of this case. Defendants are not interested in settlement or ADR and are intent on fully defending themselves in this matter.
- b. Consent to a Magistrate: The parties have discussed consenting to a magistrate. Plaintiff has shared her position with Defendants regarding

consent to a Magistrate Judge. Defendants do not yet have a position with respect to a Magistrate Judge.

- c. E-Discovery: The parties have discussed electronic discovery.

DATED: July 21, 2022.

JACKSON LEWIS P.C.

By: s/ Anthony Copple

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Attorneys for Defendants THEMARYSUE,  
LLC, Gamurs, Inc., Andrew Eisbrouch, Dan  
Van Winkle and Kaila Hale-Stern

Joint Pre-Trial Order due 21 days  
after decision of any dispositive motion.  
Ready - Trial, 48 hours notice, 21 days  
after submission of the Joint Pre-Trial Order

so ordered.

*[Signature]*

U.S.D.C.

9/21/22